C02705.2704

PPG Industries, Inc. One PPG Place Pittsburgh, Pennsylvania 15272

Law Department
Telecopy No.: (412) 434-4292
Writer's Direct Dial No.: (412) 434-2465

October 31, 1991

VIA OVERNIGHT MAIL

Mr. Paul J. Rogers
Superfund Program Management Branch
U.S. Environmental Protection Agency
5HSM TUB-7
230 South Dearborn Street
Chicago, IL 60604

RE: Supplemental Request for Information
Skinner Landfill, West Chester, Ohio

Dear Mr. Rogers:

PPG Industries, Inc. (PPG) hereby submits its response to the Supplemental Request for Information, pursuant to Section 104(e) of CERCLA, 42 U.S.C. §9604(e), and Section 3007 of RCRA, 42 U.S.C. §6927, regarding the Skinner Landfill site, located in West Chester, Ohio.

Very truly yours,

Michelle I. Ritter

Michelle I. Ritter
Attorney

MIR/sla

Enc.

RESPONSE TO SUPPLEMENTAL REQUEST FOR INFORMATION
SKINNER LANDFILL, WEST CHESTER, OHIO

1. Identify all persons consulted in the preparation of the answers to these Information Requests.

RESPONSE: The following persons were consulted in the preparation of the following responses:

Name	Address	Title
Michelle I. Ritter	PPG Industries, Inc. One PPG Place Pittsburgh, PA 15272	Attorney
David Weber	PPG Industries, Inc. P. O. Box 457 Route 23, South Circleville, OH 43113	Manager of Environmental Control
James Butler	PPG Industries, Inc. One PPG Place Pittsburgh, PA 15272	Director, Automotive Operations
Shirley Craycraft	PPG Industries, Inc. P. O. Box 457 Route 23, South Circleville, OH 43113	Administrative Services Assistant
David Dengler	PPG Industries, Inc. P. O. Box 457 Route 23, South Circleville, OH 43113	Purchasing Manager
Lloyd Swackhammer	PPG Industries, Inc. P. O. Box 457 Route 23, South Circleville, OH 43113	Shipping and Receiving Clerk

2. Identify all documents consulted, examined, or referred to in the preparation of the answers to these Requests.

RESPONSE: A diligent file search was conducted by PPG with respect to this Request for Information, however, PPG has not located any documents responsive to this Supplemental Information Request. PPG's Record Retention Policy specifies that the retention period for accounting and shipping documents is 7 years. In response to question 7, however, a Spill Prevention Control and Counter-Measure Plan (SPCC), dated July 19, 1978, was located.

3. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any Information Request or who may be able to provide additional responsive documents, identify such persons.

RESPONSE: PPG has no information which indicates that there are additional persons who may be able to provide a more complete response to any of these information requests or who may be able to provide additional responsive documents.

4. Identify all persons having knowledge or information about the transportation, treatment, disposal or other handling of materials by Chemical Leaman Tank Lines at PPG's Circleville, Ohio facility.

RESPONSE: See response to Question 1.

5. Submit all documents which state, describe, reference, or relate to any arrangement between PPG's Circleville, Ohio facility and Chemical Leaman Tank Lines for the transportation of any materials. If no such documents exist, identify and submit affidavits from knowledgeable persons concerning such arrangements. The documents and/or affidavits should, at a minimum, respond to the following:

   a) The beginning and ending dates of the relationship;

   b) Every date on which such arrangements took place or, if not available, the frequency of shipment and an estimate of the total number of shipments per year, especially during the period 1974 to 1976;

   c) For each transaction, the nature of the material or hazardous substance, including the chemical content, characteristics, physical state (e.g., solid, liquid), and the process for which the substance was used or the process which generated the substance;

   d) The quantity of the materials or hazardous substances involved (weight or volume) in each transaction and the total quantity for all transactions or, if not exactly available, a best estimate;

   e) All tests, analyses, and analytical results concerning the materials;

   f) Whether there were any agreements whether express or implied relating to the condition of vehicles to be used to transport the materials and, in particular, any

agreements that tank trucks should be cleaned, drained or rinsed in any way before or after shipment of PPG product or raw materials;

g) Whether any tags, signs, warnings, explicit directions or other indications were provided to any Chemical Leaman Tank Line employees or placed on the vehicles concerning the type of material transported and, when applicable, that the material was hazardous, poisonous, flammable, corrosive, or ignitable.

RESPONSE: PPG-Circleville acknowledges its use of Chemical Leaman for the transportation of raw materials and finished products only. However, with the exception of Appendix B attached hereto, PPG has not found any records or other information which relate to any arrangements with Chemical Leaman for the transportation of either inbound raw materials or outbound finished products. Appendix B attached hereto, is a copy of a PPG Loss and Damage claim which references expenses incurred by PPG as a result of Chemical Leaman's use of a contaminated tanker to transport PPG resins which, consequently, contaminated PPG's product. As the form indicates, this transaction has no connection to the Skinner Landfill and, therefore, PPG would object to its relevance with respect to this matter. All of the following responses are based on the recollection of various PPG employees.

a) Chemical Leaman shipped inbound raw materials to PPG's Circleville facility throughout the relevant time period. PPG also used Chemical Leaman for shipment of outbound finished products during the relevant time period.

b) We estimate that, during the relevant time period, about 300 inbound raw material shipments per year were received by PPG-Circleville via Chemical Leaman. In addition, we estimate that, during the relevant time period, Chemical Leaman delivered about 780 outbound finished products shipments to PPG customers.

c) For inbound raw material shipments, see the response to question 6.b). For outbound finished products, the following were shipped via Chemical Leaman: Polyol resin, Alkyd resin, Polyester resin and Acrylic resin. The polyol resins were nonhazardous materials. All of these materials are liquids.

d) We estimate that each shipment (either inbound or outbound) was 38,000 to 40,000 pounds. Therefore, using an average or 39,000 pounds/shipment, approximately 11.7 MM lb/yr of inbound shipments and 30.4 MM lb/yr of finished products were transported via Chemical Leaman.

e) No information is available on tests or analyses of the raw materials or finished products.

f) No agreements were recalled regarding the condition of the tankwagons when receiving raw materials. PPG required that tankwagons be cleaned before any finished products were placed in the tankwagons. PPG compensated Chemical Leaman for tank washing.

g) The tankwagons would have been placarded in compliance with DOT regulations in effect at the time. For most resins, a Flammable placard would be used; however, one PPG employee recalls that the polyol resin tankwagons did not require placarding. No other instructions were included.

6. Provide the name of all suppliers to PPG's Circleville, Ohio facility who transported material to PPG through Chemical Leaman Tank Lines. For each such supplier, provide documents or, if not available, affidavits or statements, responsive to the following:

a) Every date on which such arrangements took place, or if not available, the frequency of shipment and an estimate of the total number of shipments per year, especially during the period 1974 to 1976;

b) For each transaction, the nature of the material or hazardous substance, including the chemical content, characteristics, physical state (e.g., solid, liquid), and the process for which the substance was used or the process which generated the substance;

c) The quantity of the materials or hazardous substances involved (weight or volume) in each transaction and the total quantity for all transactions or, if not exactly available, a best estimate.

RESPONSE: No records are available as described previously. All responses are based on recollection.

a) We estimate about 300 shipments per year of inbound raw materials for 1970-1980.

b) All raw materials received were liquids. No information is available regarding which raw materials were actually shipped via Chemical Leaman, although one PPG employee recalls that the vendors using Chemical Leaman were Dow, Ashland and Monsanto.

c) About 11.7 MM lb/yr of raw materials could have been shipped via Chemical Leaman.

7. Provide a list of the hazardous materials used at PPG's Circleville, Ohio Facility.

RESPONSE: Appendix "A" attached hereto, is a list of storage tanks taken from the 1978 SPCC plan. This list specifies all materials (both hazardous and nonhazardous) stored in bulk at Circleville during the relevant time period.

8. Provide a detailed description, including the chemical content, characteristics, physical state (e.g., solid, liquid), and the process for which the substance was used or the process which generated the substance, of any resins generated, stored or otherwise used at PPG's Circleville, Ohio facility.

RESPONSE: PPG produced the following resins at Circleville during 1970-1980: Polyol resin, Alkyd resin, Polyester resin and Acrylic resin. All of these materials were produced using a batch process. The production process for these resins consisted of:

1. Charging raw materials to the reactor and weigh tanks.

2. Heating the reactor and adding raw materials to the reactor as specified by the formula.

3. Thinning the batch in solvent or water as specified by the formula.

4. Filtering the thinned resin. Completed resin can then be placed in a storage tank and pumped to a tankwagon for shipment.

9. Was Respondent aware, either specifically or generally, that a residual material at times remained in tank trucks after transport and unloading of material by Chemical Leaman Tank Lines for PPG's Circleville, Ohio facility? If so, identify all persons having such knowledge and explain the extent of their knowledge. Also, state if Respondent ever provided Chemical Leaman Tank Lines or any of its employees with any instructions for the residual materials removal, disposal or reuse and state what instructions were provided?

RESPONSE: Three PPG employees recollect an awareness of the potential for minimal amounts of residual materials to remain in tanks following delivery of finished products. To PPG's best information, knowledge and belief, PPG-Circleville did not

provide Chemical Leaman or any of its employees with any instructions for the residual materials removal, disposal or reuse.

10. Was Respondent aware, either specifically or generally, of Chemical Leaman Tank Lines policies and procedures for draining and disposing of residual material from tank trucks transporting PPG's Circleville, Ohio facility's material?

RESPONSE: No; however, PPG required that tankwagons be cleaned before any finished products were placed in the tankwagons. PPG compensated Chemical Leaman for tank washing.

11. Was Respondent aware, either specifically and generally, of Chemical Leaman Tank Lines policies and procedures for cleaning tank trucks transporting PPG's Circleville, Ohio facility's material and disposing of waste materials resulting from the cleaning process?

RESPONSE: See Response to Question 10.

12. Was Respondent aware of the use of the site for the disposal of waste materials by Chemical Leaman Tank Lines? If so, identify all persons having such knowledge.

RESPONSE: No. Site selection was made by Chemical Leaman.

A P P E N D I X " A "

STORAGE TANK IDENTIFICATION, DESCRIPTION

EXHIBIT #1	Raw Material Storage
EXHIBIT #2	Finished Goods Storage, Building #1
EXHIBIT #3	Building #2 Storage Tanks

All storage tank locations have been presented in Appendix "B".

NO.	DIMENSION	GALLON CAPACITY	CONTENTS
101	10'6" x 16'2"	10,400	Clean-up Solvent (Xylene, Toluene)
102	10'6" x 16'2"	10,400	Hydroxy Ethyl Acrylate
103	10'6" x 16'2"	10,400	Butyl Acetate
104	10'6" x 16'2"	10,400	Fatty Acid (Pamolyn 200)
105	11' x 17'6"	12,000	2 - Ethyl Hexyl Alcohol
105-B	10'6" x 16'2"	10,400	Pentoxone
106	12' x 29'4"	25,000	Diethylene Glycol
107	11' x 17'6"	12,000	N-Butyl Alcohol
108	" " " "	12,000	N-Butyl Alcohol
109	" " " "	12,000	Isopropyl Alcohol
110	10'6" x 16'2"	10,400	Butyl Cellosolve
111	" " " "	10,400	Diethylene Triamine
112	12' x 29'4"	25,000	Propylene Glycol
113	11' x 17'6"	12,000	Acrylonitrile
114	" " " "	12,000	Methacrylonitrile
115	" " " "	12,000	Methyl Ethyl Ketone
116	" " " "	12,000	Butyl Methacrylate
117	12' x 29'4"	25,000	Ethylene Glycol
118 E	10' x 20'6"	3,000	Vinyl Toluene
118 W	10' x 20'6"	9,000	Vinyl Toluene
119	11' x 17'6"	12,000	2-Ethyl Hexylacrylate
120	10'6" x 16'2"	10,400	Intermediate Resin
121	11' x 17'6"	12,000	Hi-Initial VM + P Naphtha
122	" " " "	12,000	Hexyl Cellosolve
123	" " " "	12,000	Intermediate Resin
124	11' x 17'6"	12,000	Isopar-E (Isoparaffinic Hydrocarbon)
126	10'6" x 16'2"	10,400	Cellosolve Acetate
127	11' x 17'6"	12,000	Butyl Acrylate
128	10'6" x 16'2"	10,400	Methyl Methacrylate
129	" " " "	10,400	Methyl Methacrylate
130	" " " "	10,400	Acetone
131	11' x 17'6"	12,000	Heptane
133	12' x 29'4"	25,000	Xylene
134	12' x 29'4"	25,000	Intermediate Resin
135	12' x 29'4"	25,000	Methyl Isobutyl Ketone
136	12' x 29'4"	25,000	Fuel Oil #2
137	12' x 29'4"	25,000	Toluene
138	12' x 29'4"	25,000	Isobutyl Alcohol
139	12' x 29'4"	25,000	Ethyl Acrylate
140	12' x 29'4"	25,000	Reclaimed Solvent (Xylene & Toluene)
141	12' x 29'4"	25,000	Aromatic Solvents
142	12' x 29'4"	25,000	Styrene Monomer
144	12' x 29'4"	25,000	Styrene Monomer
170	12' x 30'	25,000	Maleic Anhydride
171	12' x 30'	25,000	Epoxy Resin
172	12' x 30'	25,000	Phthalic Anhydride
173	12' x 30'	25,000	Neopentyl Glycol
174	12' x 30'	25,000	Tall Oil-Fatty Acid
175	9' x 30'	15,000	Dipropylene Glycol
176	9' x 30'	15,000	Fatty Acid
177	12' x 30'	25,000	Golden Varnish Oil
910 S/T	8' x 16'	6,000	Tertiary Dodecyl Mercaptan
955 S/T	8' x 16'	6,000	Methacrylic Acid
108	19'6"x 7' x 9'6"	9,690	Toluene Di Isocyanate
166	12' x 14' x 14'8"	15,000	Epoxy Resin
167	12' x 14' x 14'8"	15,000	Intermediate Resin

EXHIBIT "L"

STORAGE TANK IDENTIFICATION

NO.	DIMENSION	GALLON CAPACITY
110	11'6" x 20'	15,000
111	" " "	" "
112	" " "	" "
113	" " "	" "
114	" " "	" "
115	" " "	" "
117	8' x 12' x 16'9"	12,000
118	" " " " " "	" "
119	" " " " " "	" "
120	" " " " " "	" "
121	8' x 12' x 16'3"	11,600
122	" " " " " "	" "
125	10' x 14' x 17'6"	16,000
126	" " " " " "	" "
127	" " " " " "	" "
128	" " " " " "	" "
129	" " " " " "	" "
130	" " " " " "	" "
131	" " " " " "	" "
132	" " " " " "	" "
133	" " " " " "	" "
134	" " " " " "	" "
153	9' x 13' x 18'	12,264
154	" " "	" "
155	" " "	" "
156	" " "	" "
157	" " "	" "
158	" " "	" "
159	10'8" x 13' x 18'	14,900
160	" " " "	" "
161	" " " "	" "
162	" " " "	" "
163	" " " "	" "
164	12' x 14' x 14'8"	16,000
165	" " " "	" "
168	" " " "	" "
169	" " " "	" "
170	" " " "	" "
171	" " " "	" "
172	9' x 17'	8,000
173	" "	" "
174	" "	" "
175	" "	" "
176	" "	" "
177	9' x 12' x 19'	15,300
178	9' x 12' x 19'	15,300
181	8' x 12' x 16'9"	12,000
182	" " "	" "
183	" " "	" "
184	" " "	" "
185	" " "	" "
186	" " "	" "
188	" " "	" "
190	" " "	" "
191	" " "	" "
192	" " "	" "
193	" " "	" "

NO.	DIMENSION	GALLON CAPACITY
195	8' x 12' x 16'9"	12,000
196	8" x 12' x 16'9"	12,000

Exhibit "3"

STORAGE TANK IDENTIFICATION

NO.	DIMENSION	GALLON CAPACITY	CONTENTS
104	9' x 24'	12,000	"Freon" 11B
109	11'6" x 30'	25,000	Propylene Oxide
110	11'6" x 30'	25,000	Propylene Oxide
114	9' x 21'6"	11,000	Ethylene Oxide
115	9' x 21'6"	11,000	Ethylene Oxide
142	9'6" x 19'	10,000	Polyether Polyol
143	" " "	" "	" "
144	" " "	" "	" "
145	" " "	" "	" "
146	" " "	" "	" "
147	" " "	" "	" "
148	" " "	" "	" "
149	" " "	" "	" "
150	" " "	" "	" "
151	" " "	" "	" "
152	" " "	" "	" "
153	" " "	" "	" "
154	" " "	" "	" "
155	" " "	" "	" "
190	" " "	" "	Monoethanolamine
191	" " "	" "	Polyether Polyol

Draft 1/31/72

FORM 415 REV. 5/1/64

LOSS AND DAMAGE CLAIM

PITTSBURGH PLATE GLASS COMPANY
ONE GATEWAY CENTER, PITTSBURGH 22, PA.

CO. UNIT PPG Industries, Inc., Circleville, Ohio

APPENDIX " B "

DATE

RECEIVED
OCT 3rd, 1991
LAW DEPARTMENT

LOCATION NO. 812

CLAIM AGENT

CARRIER

CARRIER'S ADDRESS

CARRIER'S NO.

THIS CLAIM FOR $ 2,207.82 ☐ DAMAGE ☒ LOSS

CONSIGNOR (SHIPPER) PPG Industries, Inc. DATE SHIPPED 8-25-71

SHIPPED FROM Circleville, Ohio CAR NO. FRT. BILL NO.

FINAL DESTINATION Joliet, Illinois 60435 ROUTED VIA Chemical

DETAILED STATEMENT SHOWING HOW AMOUNT CLAIMED IS DETERMINED

Expenses incurred as a result of a contaminated pump and/or hoses per conversation between Mr. Harold Reed and Mr. Tom Daugherty of Chemical Leman's, Ross Terminal at Cincinnati, Ohio. per detail attached	$831.72
Additional charges for material not returned to Circleville. Material was contaminated and unsalvagable: It had to be dumped at Banner Disposal Service Co., Joliet, Ill. Per Detail Attached 8340# @ .165	1,376.10
TOTAL	$ 2,207.82

INDEMNITY AGREEMENT

In the absence of original freight bill and/or original bill of lading which cannot be furnished account _____ *we hereby guarantee to protect* (LOST OR DESTROYED)

_____ *(Carrier)*

or any connecting carrier or carriers as their respective interests may appear, against any and all loss, damage, costs, expenses and attorney's fees which may result from the presentation from any source of a duplicate claim on same shipment.

_____ *(Signature of Claimant)*

IN ADDITION TO THE INFORMATION GIVEN ABOVE, THE FOLLOWING DOCUMENTS ARE SUBMITTED IN SUPPORT OF THIS CLAIM

☒ Copy of ~~ORIGINAL~~ BILL OF LADING IF NOT PREVIOUSLY SURRENDERED TO CARR

☐ ORIGINAL PAID FREIGHT ("Express") BILL

☒ Copy of ~~ORIGINAL~~ INVOICE OR CERTIFIED COPY

☒ OTHER PARTICULARS OBTAINABLE IN PROOF OF LOSS OR DAMAGE CLAIMED: (See below)

REMARKS

1. Letter from customer indicating costs incurred as result of contaminated tanker.

2. Copies of Credit Memos issued to customer.

The foregoing statement of facts is hereby certified as correct.

PITTSBURGH PLATE GLASS COMPANY

By _____ *Dir. of Trf. & Tran*

Kemlite Corporation
MANUFACTURERS OF FIBER GLASS REINFORCED PLASTICS AND RELATED PRODUCTS
P.O. BOX 429 · 101 N. REPUBLIC AVENUE · JOLIET, ILLINOIS 60434
TELEPHONE · 815-725-1112 (JOLIET) · 312-242-4827 (CHICAGO)

To: Jim Butler
Pls Process this Credit
J & D.

September 3, 1971

Mr. John Dayton
P P G Industries
3166 Des Plaines Avenue
Des Plaines, Illinois 60018

Dear John,

Thursday, August 26th we were scheduled and did attempt to receive one (1) tank truck load of Selectron 5550098. Inspite of our standard request that the delivering unit must be equipped with thirty (30) feet of hose to connect into a three (3) inch line for air unloading, this unit was not. It had a pump and two (2) inch lines. Our storage tank was at its lowest point with a heel of 1,368 pounds.

A sample was taken from the tankers man hole, tested and accepted by our lab. The material was started into our tank. Our receiver went to the top of the tank to confirm the resin was coming in at an acceptable rate, noted its peculiar color, sent for his supervisor. Together with Don Morse they pulled a sample. The unloading was stopped. An effort was made to determine the cause of contamination. The two (2) inch hose from the pump to our tank was changed, but this did not correct the problem. The hose was removed from our receiving line and resin then pumped into an open container to allow for closer inspection. The contamination was still evident, however it was acceptable. It seemed certain to have originated in the pump and or its associate lines. It was then we realized there was not room in the other tanks to take the balance of the resin. About that time you and I talked and the rest you know.

At your direction we have made arrangements to put this material into drums and have them hauled away. The storage tank must then be cleaned before another load can be received. The cost of this to be incurred by your company. (See attched break down). We have had an excellent arrangement with Matlock, Inc. and PPG's own carriers. John, if you have any questions give me a call.

Very truly yours,

KEMLITE CORPORATION

John W. Muren
Vice President &
General Manager

JWM:rjh
Enclosures